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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

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11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 vs.  
14 TONIQUEWA BALLARD,  
15 Defendant.

Case No.:2:15-CR-195-GMN-CWH

**UNOPPOSED MOTION AND**  
**PROPOSED ORDER TO MODIFY THE**  
**CONDITIONS OF PRETRIAL RELEASE**  
(Expedited Treatment Requested)

16 COMES NOW THE DEFENDANT, TONIQUEWA BALLARD, by and through counsel,  
17 Rene Valladares, Federal Public Defender, and Heidi A. Ojeda, Assistant Federal Public Defender,  
18 and hereby submit this Motion to Modify Conditions of Pre-Trial Release requesting that Ms.  
19 Ballard be allowed to travel to California from August 27-29, 2015.

20 Dated this 25<sup>th</sup> day of August, 2015.

21 RENE L. VALLADARES  
Federal Public Defender

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23 By: /s/ Heidi A. Ojeda  
Assistant Federal Public Defender  
24 Counsel for Defendant  
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1                                    **MEMORANDUM OF POINTS AND AUTHORITIES**

2            On August 3, 2015, the Court released Ms. Ballard on a personal recognizance bond.  
3    (*See Minutes of Proceedings (#20).*) Among the conditions imposed, the Court ordered that the  
4    defendant shall reside at the halfway house and is restricted to that facility at all times except for  
5    certain approved activities. (*See PR Bond at 3 -4 (#21).*) The Court further restricted Ms. Ballard's  
6    travel to Clark County, Nevada. (*Id.*) To date, Ms. Ballard has complied with all the conditions of  
7    pre-trial release.

8            Ms. Ballard requests permission to travel to Lancaster, California, from Thursday, August  
9    27, 2015 through Saturday, August 29, 2015. The purpose of this travel is so she can meet with her  
10   Social Security Disability advocate to ensure that she gets the full benefits associated with her  
11   Supplemental Security Income (SSI). Ms. Ballard has been receiving SSI payments since 2003 due  
12   to her mental health condition. Ms. Ballard was instructed by her local Social Security  
13   Administration office that she must meet with them in person by Friday, August 28, 2015. Ms.  
14   Ballard currently has an appointment to meet with her SSI advocate on the morning of Friday,  
15   August 28, 2015.

16           Ms. Ballard's mother will be driving her from Las Vegas, Nevada to Lancaster, California  
17   for the appointment. During her stay in California, Ms. Ballard will likely be staying with her aunt.  
18   Ms. Ballard is working closely with her pre-trial services officer, Samira Barlow, to provide all the  
19   necessary logistical and contact information for where she will be during her travel.

20           Undersigned counsel has spoken with the Government concerning this request. The  
21   Government has indicated it has no opposition to this modification. Undersigned counsel has also  
22   spoken to Ms. Ballard's Pre-Trial officer, Ms. Barlow. Ms. Barlow also indicated that she has no  
23   opposition to the requested modification. Ms. Barlow only asks that Ms. Ballard submit proof of  
24   her appointment to Pre-Trial Services upon her return from California.

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1 DATED this 25<sup>th</sup> day of August, 2015.

2 Respectfully Submitted,

3 RENE L. VALLADARES  
4 Federal Public Defender

5 */s/ Heidi A. Ojeda*

6 By: \_\_\_\_\_  
7 HEIDI A. OJEDA  
8 Assistant Federal Public Defender  
9 Counsel for Defendant  
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TONIQUEWA BALLARD,

Defendant.

Case No.: 2:15-cr-195-GMN-CWH

**ORDER TO MODIFY PRETRIAL  
CONDITIONS**

**ORDER**

**GOOD CAUSE APPEARING, IT IS HEREBY ORDERED** that the pretrial release conditions of the defendant be modified to permit Ms. Ballard to travel to California, leaving from the halfway house on Thursday, August 27, 2015 and returning to the halfway house in Las Vegas, Nevada on Saturday, August 29, 2015. During this time, Ms. Ballard is to follow all the conditions previously placed upon her by the Court (as applicable) and any additional conditions her pre-trial services officer deems appropriate during her travel.

**IT IS FURTHER ORDERED** that upon return to Las Vegas, Nevada, Ms. Ballard shall promptly submit proof of her appointment with the Social Security Administration to her Pre-Trial Services officer.

DATED: August 25, 2015

  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that I am an employee of the Federal Public Defender for the District of Nevada and am a person of such age and discretion as to be competent to serve papers.

That on August 25, 2015, I served an electronic copy of the above and foregoing

**UNOPPOSED MOTION AND PROPOSED ORDER TO MODIFY THE CONDITIONS OF PRETRIAL RELEASE** (Expedited Treatment Requested), by electronic service (ECF) to the

person named below:

DANIEL G. BOGDEN  
United States Attorney  
ROBERT KNIEF  
Assistant United States Attorney  
333 Las Vegas Blvd. So., 5<sup>th</sup> Floor  
Las Vegas, Nevada 89101

/s/ Christopher Vergari  
Employee of the Federal Public Defender